

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

In re:

Wisconsin & Milwaukee Hotel LLC,

Debtor.

Case No. 24-21743-gmh  
Chapter 11

**JUNE 2024 FEE STATEMENT OF RICHMAN & RICHMAN LLC  
AS COUNSEL TO DEBTOR**

Applicant:	Richman & Richman LLC
Counsel for:	Wisconsin & Milwaukee Hotel LLC
Period for compensation and reimbursement:	June 1, 2024 through June 30, 2024
Amount of compensation sought as actual, reasonable, and necessary:	\$62,610.00
Amount of reimbursement expenses sought as actual, reasonable, and necessary:	\$759.76
Total interim approval requested:	<b>\$63,369.76</b>

Dated this 10<sup>th</sup> day of July 2024.

**RICHMAN & RICHMAN**  
**Attorneys for the Debtor**

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# Richman & Richman LLC

122 W Washington Ave, Suite 850  
Madison, WI 53703-2732

# INVOICE

Invoice # 880  
Date: 07/10/2024  
Due On: 08/09/2024

Wisconsin & Milwaukee Hotel LLC  
c/o Jackson Street Management LLC  
Attn: Mr. Edward G. Carow  
731 N. Jackson Street, Suite 420, Milwaukee WI53202

## Wisconsin & Milwaukee Hotel LLC/-2024.00023

### Chapter 11

#### Services

Type	Date	Notes	Timekeeper	Quantity	Rate	Total
Service	06/03/2024	1109 - Asset Analysis & Recovery: Review and prepare summaries of underlying agreements of WHEDA loans.	KAH	2.80	\$275.00	\$770.00
Service	06/03/2024	1105 - Plan & Disclosures: Review court's case management order to note and ensure compliance re: deadlines and procedures re: service, disclosure statement and plan, and confirmation procedures	DTF	0.20	\$195.00	\$39.00
Service	06/03/2024	1102 - Case Administration / US Trustee: email to C. Brown re taxes, temp agency issue, lender discovery, and MORs (.1); prep of email to WMH team re status of WL in relation to MORs and financial advisor (.2)	MPR	0.30	\$750.00	\$225.00
Service	06/03/2024	1109 - Asset Analysis & Recovery: Eisner Group status/strategy meeting by Teams (.4); provide doc package and prep of related email to Eisner Group for review/analysis (.2)	MPR	0.60	\$750.00	\$450.00
Service	06/03/2024	1112 - Debtor Meetings & Communications: Email to team re weekly mtg (.1); client team status/strategy meeting by Zoom (.5)	MPR	0.60	\$750.00	\$450.00
Service	06/03/2024	1108 - Employment, Billing & Compensation: Continue preparing Application to Employ Mallery SC as special counsel for Debtor, including	EMR	0.30	\$450.00	\$135.00

		preparing email to Attorney Christopher Strohbehn regarding his Declaration in support of same.				
Service	06/04/2024	1102 - Case Administration / US Trustee: Review management agreement between WMH and White Lodging	CML	1.20	\$175.00	\$210.00
Service	06/04/2024	1102 - Case Administration / US Trustee: Draft memo regarding availability of specific performance to comply with document requests.	CML	0.50	\$175.00	\$87.50
Service	06/04/2024	1102 - Case Administration / US Trustee: Review WL management agreement to determine events of default and conduct legal research on specific performance of contracts.	CML	1.80	\$175.00	\$315.00
Service	06/04/2024	1102 - Case Administration / US Trustee: Emails w/White Lodging counsel re information and data access by Eisner in relation to MOR requirements and related matters (.4); t/conf w/C. Brown re same and other case management issues, including payment of worker comp claims and appraisal discovery sought by Lender (.3)	MPR	0.70	\$750.00	\$525.00
Service	06/04/2024	1108 - Employment, Billing & Compensation: Emails w/L. Steele re alternative comp settlement letter and order (.1); review and revise draft letter to Court and order (.2)	MPR	0.30	\$750.00	\$225.00
Service	06/04/2024	1108 - Employment, Billing & Compensation: Prepare proposed agreed order granting Debtor's Motion for Alternative Compensation Procedures for Professionals (.8); prepare correspondence to Judge Halfenger to accompany proposed order (.2); prepare revisions to agreed order and correspondence to finalize same (.2); prepare email to Attorney Laura Steele providing agreed order and correspondence for her review and approval (.2).	EMR	1.40	\$450.00	\$630.00
Service	06/04/2024	1110 - Claim Management Issues: Begin analysis of workers comp claims to determine classification of same.	EMR	0.70	\$450.00	\$315.00
Service	06/04/2024	1108 - Employment, Billing & Compensation: Receive and review email from Attorney Chris Strohbehn providing additional information for Declaration in support of Application to Employ (.1);	EMR	1.10	\$450.00	\$495.00

		phone conference with Attorney John Herreman at Mallery SC to discuss Declaration (.2); prepare revisions to Declaration of Christopher Strohbehn (.8).				
Service	06/04/2024	1102 - Case Administration / US Trustee: Review email string between Debtor and White Lodging regarding documents and information needed for April MOR to review status of same.	EMR	0.20	\$450.00	\$90.00
Service	06/05/2024	1108 - Employment, Billing & Compensation: Work on Mallery employment app and Strohbehn dec in support	MPR	0.30	\$750.00	\$225.00
Service	06/05/2024	1102 - Case Administration / US Trustee: Emails w/C. Brown and D. Friedland to arrange call for Eisner access to financial data for bk reporting (.1); followup emails re MORs and info requests, mtg schedule (.2)	MPR	0.30	\$750.00	\$225.00
Service	06/05/2024	1108 - Employment, Billing & Compensation: Prepare revisions to Mallery SC Employment Application and Strohbehn Declaration (1.0); prepare email to MPR forwarding same for his review (.1)	EMR	1.10	\$450.00	\$495.00
Service	06/06/2024	1108 - Employment, Billing & Compensation: Final review of Mallery app and Strohbehn dec (.3); review/approve final order for uploading on alt comp procedures (.1)	MPR	0.40	\$750.00	\$300.00
Service	06/06/2024	1108 - Employment, Billing & Compensation: Finalize proposed order granting motion for alternative compensation procedures and letter to court regarding same.	EMR	0.30	\$450.00	\$135.00
Service	06/06/2024	1108 - Employment, Billing & Compensation: Prepare additional revisions and language to Application to Employ Mallery SC as special counsel to the Debtor and Declaration of Christopher Strohbehn (1.2); prepare email to Attorney Christopher Strohbehn forwarding same for final review and signature on Declaration (.2); prepare email to Attorney Strohbehn forwarding filed stamped copies of Application and Declaration (.1).	EMR	1.50	\$450.00	\$675.00
Service	06/07/2024	1108 - Employment, Billing & Compensation: Review file and court order on alternative compensation procedures to ensure compliance with all procedures, deadlines, and plan for fee applications	DTF	0.40	\$195.00	\$78.00

Service	06/07/2024	1104 - DIP Financing / Cash Collateral: Review DiCatri email re April adequate protection payment and assemble info for review by Eisner re same (.4); prep of email report to client team re same, positions and strategies (.1); prep of reply email to DiCatri demand for immediate response to settlement proposal (.3); followup t/conf w/Eisner team re status and strategies re same (.3)	MPR	1.10	\$750.00	\$825.00
Service	06/07/2024	1102 - Case Administration / US Trustee: Teams mtg w/C. Brown, D. Friedland and R. Katz re access to debtor financial data at WL, processes and needs for all financial reporting	MPR	0.70	\$750.00	\$525.00
Service	06/07/2024	1110 - Claim Management Issues: Review info from and reply to C. Brown re workers comp claims to assess whether pre or post petition	MPR	0.10	\$750.00	\$75.00
Service	06/07/2024	1106 - Misc Motions & Court Hearings: Review draft of motion to pay employment agency to determine information needed or same.	EMR	0.20	\$450.00	\$90.00
Service	06/07/2024	1108 - Employment, Billing & Compensation: Review R&R LLC April and May 2024 billing statements to prepare request for payment of same.	EMR	0.80	\$450.00	\$360.00
Service	06/10/2024	1108 - Employment, Billing & Compensation: Review draft invoices and prepare draft fee statement for R&R for April 2024 pursuant to alternative compensation procedures order	DTF	0.40	\$195.00	\$78.00
Service	06/10/2024	1108 - Employment, Billing & Compensation: Review draft invoice and prepare draft fee statement for R&R for May 2024 pursuant to alternative compensation procedures order	DTF	0.30	\$195.00	\$58.50
Service	06/10/2024	1108 - Employment, Billing & Compensation: Draft proposed order conditionally approving payment of April 2024 invoice	DTF	0.30	\$195.00	\$58.50
Service	06/10/2024	1108 - Employment, Billing & Compensation: Draft proposed order conditionally approving payment of May 2024 invoice	DTF	0.20	\$195.00	\$39.00
Service	06/10/2024	1106 - Misc Motions & Court Hearings: Prepare preliminary draft objection to Computershare's Rule 2004 Motion for	DTF	0.60	\$195.00	\$117.00

Discovery from Debtor and White Lodging						
Service	06/10/2024	1108 - Employment, Billing & Compensation: Prepare applications to employ accountants and lobbyist	KAH	3.90	\$275.00	\$1,072.50
Service	06/10/2024	1102 - Case Administration / US Trustee: Conduct legal research of potential enforcement of management contract in case law.	CML	1.20	\$175.00	\$210.00
Service	06/10/2024	1102 - Case Administration / US Trustee: Conduct legal research on enforcements of contract management. Read In re Layton, research based on breach of contract action by-passing the automatic stay.	CML	0.80	\$175.00	\$140.00
Service	06/10/2024	1102 - Case Administration / US Trustee: Review WMH file for information to draft confidentiality agreement between WMH, White Lodging, Computershare, WMH Funding, and FirstPathway	JES	2.50	\$275.00	\$687.50
Service	06/10/2024	1102 - Case Administration / US Trustee: Prepare confidentiality agreement between WMH, White Lodging, Computershare, WMH Funding, and FirstPathway	JES	3.10	\$275.00	\$852.50
Service	06/10/2024	1108 - Employment, Billing & Compensation: Phone conference with Erin Horman at Sikich regarding application to employ Sikich as accountant for the debtor (.2); prepare email to Erin Horman providing information to conduct conflict check (.2).	EMR	0.40	\$450.00	\$180.00
Service	06/10/2024	1108 - Employment, Billing & Compensation: Review and prepare final revisions to R&R April and May 2024 invoices for filing with the court for conditional approval.	EMR	0.40	\$450.00	\$180.00
Service	06/10/2024	1108 - Employment, Billing & Compensation: Phone conference with Moira Fitzgerald regarding process to employ Fitzgerald Consulting as lobbyist for the debtor.	EMR	0.20	\$450.00	\$90.00
Service	06/10/2024	1112 - Debtor Meetings & Communications: Status/strategy t/conf w/ M. Flaherty	MPR	0.30	\$750.00	\$225.00
Service	06/10/2024	1109 - Asset Analysis & Recovery: work on confi stip and doc prodn re lender 2004 discovery motion for appraisal; related emails to F. DiCatri and client team (.3); review DiCatri emails and prep of replies	MPR	1.20	\$750.00	\$900.00

		re discovery process and confidentiality issues (.9)				
Service	06/10/2024	1104 - DIP Financing / Cash Collateral: work on proposed reply to Lender demand for April adeq protection	MPR	1.00	\$750.00	\$750.00
Service	06/10/2024	1102 - Case Administration / US Trustee: t/ conf w/D. Friedland re MOR info needed (.1); emails re arrangements for Eisner site visit (.1)	MPR	0.20	\$750.00	\$150.00
Service	06/11/2024	1107 - Adversary Proceedings: Review final order authorizing cash collateral (.3); Research re: cash collateral order (1.1); Research re: Rule 60(b) (2.1)	KAH	3.50	\$275.00	\$962.50
Service	06/11/2024	1108 - Employment, Billing & Compensation: Revise motion to pay contract employees.	KAH	1.30	\$275.00	\$357.50
Service	06/11/2024	1104 - DIP Financing / Cash Collateral: Further work on reply to DiCastrì demand for April adequate protection payment of \$125k	MPR	0.50	\$750.00	\$375.00
Service	06/11/2024	1106 - Misc Motions & Court Hearings: Continue preparing motion to pay temporary agency for contract employees and Declaration of Ben Risseuw in support of same.	EMR	2.80	\$450.00	\$1,260.00
Service	06/11/2024	1106 - Misc Motions & Court Hearings: Prepare draft of objection to Computershare's Motion for 2004 Exam.	EMR	0.40	\$450.00	\$180.00
Service	06/12/2024	1107 - Adversary Proceedings: Research re: 60(b)(5) in bankruptcy cases	KAH	1.40	\$275.00	\$385.00
Service	06/12/2024	1109 - Asset Analysis & Recovery: Work on obj to rule 2004 discovery	MPR	1.90	\$750.00	\$1,425.00
Service	06/12/2024	1113 - Executory Contracts: t/c w/M. Flaherty and w/C. Brown and emails re threatened motion to compel assumption/ rejection of WL contract (.2); prep of email to WMH team re same (.2)	MPR	0.40	\$750.00	\$300.00
Service	06/12/2024	1112 - Debtor Meetings & Communications: Zoom client team strategy meeting	MPR	0.30	\$750.00	\$225.00
Service	06/12/2024	1108 - Employment, Billing & Compensation: Prepare email to Moira Fitzgerald providing information for conflict check and requesting information to prepare application to employ Fitzgerald Consulting as lobbyist for Debtor (.3);	EMR	0.40	\$450.00	\$180.00



		conduct email exchange with Jennifer Cordova regarding Fitzgerald Consulting's fees (.1).				
Service	06/12/2024	1106 - Misc Motions & Court Hearings: Review Objection to Computershare's Motion for 2004 Exam to assist in finalizing same.	EMR	0.20	\$450.00	\$90.00
Service	06/13/2024	1106 - Misc Motions & Court Hearings: Conduct legal research on remedies granted by courts on motions to compel assumption or rejection of executory contract.	CML	1.20	\$175.00	\$210.00
Service	06/13/2024	1113 - Executory Contracts: Research re: reasonable notice to assume or reject executory contracts.	KAH	0.70	\$275.00	\$192.50
Service	06/13/2024	1102 - Case Administration / US Trustee: Prepare proposed confidentiality agreement between WMH, White Lodging, Computershare, WMH Funding, and FirstPathway	JES	2.20	\$275.00	\$605.00
Service	06/13/2024	1102 - Case Administration / US Trustee: mtgs w/M. Flaherty, D. Friedland at hotel in Milwaukee, and with hotel manager re hotel operations and site visit (2.0); t/cs w/D/ Friedland re issues/strategies for mtgs (.5)	MPR	2.50	\$750.00	\$1,875.00
Service	06/13/2024	1102 - Case Administration / US Trustee: round-trip nonworking travel to Milwaukee for meetings w/hotel general manager, M. Flaherty and D. Friedland (billed at one-half hourly rate)	MPR	2.50	\$375.00	\$937.50
Service	06/13/2024	1113 - Executory Contracts: review WL motion to compel assumption/rejection and prep of email to client team re same	MPR	0.30	\$750.00	\$225.00
Service	06/13/2024	1108 - Employment, Billing & Compensation: Review email from Erin Horman at Sikich LLP providing information needed for application to employ Sikich as accountant for Debtor.	EMR	0.20	\$450.00	\$90.00
Service	06/13/2024	1106 - Misc Motions & Court Hearings: Conduct brief review of White Lodging's Motion to Compel Debtor to Assume or Reject Management Agreement, including reviewing objection deadline for same.	EMR	0.30	\$450.00	\$135.00
Service	06/14/2024	1108 - Employment, Billing & Compensation: Revise application to employ accountant (1); Draft declaration of Sikich Principal (2.3)	KAH	3.30	\$275.00	\$907.50

Service	06/14/2024	1106 - Misc Motions & Court Hearings: Review WL motion and management agreement.	CML	1.10	\$175.00	\$192.50
Service	06/14/2024	1108 - Employment, Billing & Compensation: Revise application to employ lobbyist and declaration	KAH	1.20	\$275.00	\$330.00
Service	06/14/2024	1102 - Case Administration / US Trustee: Prepare confidentiality agreement between WMH, White Lodging, Computershare, WMH Funding, and FirstPathway	JES	4.30	\$275.00	\$1,182.50
Service	06/14/2024	1106 - Misc Motions & Court Hearings: review WL obj to discovery and revise debtor's obj to r. 2004 discovery	MPR	1.00	\$750.00	\$750.00
Service	06/14/2024	1102 - Case Administration / US Trustee: T/conf (.2) and Teams mtg (.2) w/Eisner Group re MOR issues	MPR	0.40	\$750.00	\$300.00
Service	06/14/2024	1106 - Misc Motions & Court Hearings: Prepare objection to Motion to Compel.	CML	2.20	\$175.00	\$385.00
Service	06/17/2024	1113 - Executory Contracts: Research re: motion to compel assumption or rejection of management agreement (.5); Review draft objection to motion to compel (1.1)	KAH	1.60	\$275.00	\$440.00
Service	06/17/2024	1106 - Misc Motions & Court Hearings: Prepare Objection to Motion to Compel; including legal research on court authority to compel the assumption or rejection of executory contracts.	CML	3.40	\$175.00	\$595.00
Service	06/17/2024	1106 - Misc Motions & Court Hearings: Draft Objection to Motion to Compel	CML	3.10	\$175.00	\$542.50
Service	06/17/2024	1102 - Case Administration / US Trustee: Edit confidentiality agreement between WMH, White Lodging, Computershare, WMH Funding, and FirstPathway	JES	3.50	\$275.00	\$962.50
Service	06/17/2024	1109 - Asset Analysis & Recovery: Review court order on appraisal discovery and prep of email to client team re same (.3); work on draft confidentiality agreement for appraisal discovery (.7)	MPR	1.00	\$750.00	\$750.00
Service	06/17/2024	1108 - Employment, Billing & Compensation: Prepare proposed order granting Application to Employ EA Group as financial advisor to the Debtor.	EMR	0.80	\$450.00	\$360.00
Service	06/17/2024	1108 - Employment, Billing & Compensation: Prepare proposed order granting Application to Employ Allen & Associates as appraiser for the Debtor for	EMR	0.80	\$450.00	\$360.00

		property tax appeal.				
Service	06/18/2024	1106 - Misc Motions & Court Hearings: Revise draft of Objection to Motion to Compel	CML	0.50	\$175.00	\$87.50
Service	06/18/2024	1103 - Petition, Schedules & Financials: Review and prepare finalized monthly operating report for court filing	DTF	0.20	\$195.00	\$39.00
Service	06/18/2024	1102 - Case Administration / US Trustee: Attention to MOR final and notes for filing (.2); prep of emails re MORs (.2);	MPR	0.40	\$750.00	\$300.00
Service	06/18/2024	1106 - Misc Motions & Court Hearings: prep of email to C. Brown re info needed for workers' comp claim motion (.1); work on motion to pay prepetition temp employment agency and Risseuw dec (1.2)	MPR	1.30	\$750.00	\$975.00
Service	06/18/2024	1102 - Case Administration / US Trustee: teams mtg w/D. Friedland re various pending financial issues for MORs and motions (.3)	MPR	0.30	\$750.00	\$225.00
Service	06/18/2024	1102 - Case Administration / US Trustee: Review proposed April 2024 monthly operating report (.3); phone conference with Shaq Williams at EA Group to discuss certain questions and concerns regarding same (.3); review revised April 2024 and finalize same (.2).	EMR	0.80	\$450.00	\$360.00
Service	06/18/2024	1106 - Misc Motions & Court Hearings: Review information provided by counsel for White Lodging on existing worker's comp claims to begin analysis of payments of same.	EMR	0.50	\$450.00	\$225.00
Service	06/19/2024	1106 - Misc Motions & Court Hearings: Draft motion to assume contract w/ V&J Services	CML	1.20	\$175.00	\$210.00
Service	06/19/2024	1112 - Debtor Meetings & Communications: Prep of email re agenda for team meeting (.1); client team zoom meeting re status, strategies and all pending matters (.7)	MPR	0.80	\$750.00	\$600.00
Service	06/19/2024	1110 - Claim Management Issues: prep of emails to utility threatening to stop service (.8); prep of further cease and desist to WE Energies (.3)	MPR	1.10	\$750.00	\$825.00
Service	06/19/2024	1106 - Misc Motions & Court Hearings: review Brown edits to Risseuw Dec for motion to pay temp agency (.1); emails w/	MPR	0.50	\$750.00	\$375.00

		C. Brown re temp agency motion (.1); further work on motion and dec in support for payment of temp agency and amend to motion to assume contract (.3)				
Service	06/19/2024	1109 - Asset Analysis & Recovery: emails w/D. Friedland re operations issues (.1); work on confidentiality stip (1.9); t/conf w/D. Friedland re operations and maintenance issues (.2); prep of email to F. DiCatri re appraisal discovery and elevator repair need (.4)	MPR	2.60	\$750.00	\$1,950.00
Service	06/19/2024	1102 - Case Administration / US Trustee: email re claims arising from potential contract rejection (.1); email re MOR process (.1)	MPR	0.20	\$750.00	\$150.00
Service	06/19/2024	1108 - Employment, Billing & Compensation: Prepare proposed order granting Application to Employ Mallory SC as special counsel to the Debtor.	EMR	0.50	\$450.00	\$225.00
Service	06/19/2024	1102 - Case Administration / US Trustee: Review provisions of Order Granting Motion to Provide Utility Providers with Adequate Assurance and corresponding Certificate of Service serving same on utility providers to determine and confirm service of same upon WE Energies to address WE Energies' threats to discontinue service.	EMR	0.30	\$450.00	\$135.00
Service	06/19/2024	1102 - Case Administration / US Trustee: Several phone calls with Shaq Williams at EA Group (x2) to discuss filing an amended April monthly operating report to include supporting documentation.	EMR	0.50	\$450.00	\$225.00
Service	06/20/2024	1106 - Misc Motions & Court Hearings: Draft of Motion to Assume contract w/V&J Services and in support of same and Risseuw declaration.	CML	1.60	\$175.00	\$280.00
Service	06/20/2024	1106 - Misc Motions & Court Hearings: Revise draft of Motion to Assume Executory Contract	CML	0.60	\$175.00	\$105.00
Service	06/20/2024	1106 - Misc Motions & Court Hearings: Finalize Motion to Assume contract w/V&J Services, Notice of Motion, and Risseuw Declaration	CML	0.70	\$175.00	\$122.50
Service	06/20/2024	1106 - Misc Motions & Court Hearings: Review file and court order for details and status of all documents necessary for production per court order on Rule 2004	DTF	0.80	\$195.00	\$156.00

		motion and prepare documents in progress for same				
Service	06/20/2024	1102 - Case Administration / US Trustee: Prepare revisions proposal to confidentiality agreement between WMH, White Lodging, Computershare, WMH Funding, and FirstPathway	JES	2.10	\$275.00	\$577.50
Service	06/20/2024	1108 - Employment, Billing & Compensation: Revise and update proposed orders approving fees for monthly invoices pursuant to court order on alternative compensation procedures	DTF	0.40	\$195.00	\$78.00
Service	06/20/2024	1102 - Case Administration / US Trustee: t/ conf w/W. Pedersen (Eisner) re MOR process (.2)	MPR	0.20	\$750.00	\$150.00
Service	06/20/2024	1106 - Misc Motions & Court Hearings: review updated Risseuw Declaration in support of motion to assume V&J contract (.1); further work on declaration and Motion to Assume V&J contract (1.2)	MPR	1.30	\$750.00	\$975.00
Service	06/20/2024	1110 - Claim Management Issues: review emails on threatened WE Energies shutoff, and prep of further email to WE Energies re cease and desist (.3)	MPR	0.30	\$750.00	\$225.00
Service	06/20/2024	1109 - Asset Analysis & Recovery: Further work on confidentiality agreement for r. 2004 discovery (.3)	MPR	0.30	\$750.00	\$225.00
Service	06/21/2024	1110 - Claim Management Issues: Review proof of claim of WMH Funding LLC and loan documents	KAH	1.90	\$275.00	\$522.50
Service	06/21/2024	1103 - Petition, Schedules & Financials: Prepare and finalize with attachments Amended Monthly Operating Report for April 2024	DTF	0.40	\$195.00	\$78.00
Service	06/21/2024	1106 - Misc Motions & Court Hearings: Update and finalize Motion to Assume Executory Contract and prepare for court filing and service on creditors	DTF	0.60	\$195.00	\$117.00
Service	06/21/2024	1108 - Employment, Billing & Compensation: Update and finalize proposed orders approving alternative compensation procedures for April and May 2024	DTF	0.40	\$195.00	\$78.00
Service	06/21/2024	1106 - Misc Motions & Court Hearings: Emails w/C. Brown and Eisner re workers comp payment/motion issues (.1); review	MPR	0.60	\$750.00	\$450.00

		C. Brown email and finalize for filing motion to assume V&J contract (.4); further emails re worker comp issues (.1)				
Service	06/21/2024	1110 - Claim Management Issues: Emails to client teams re various claims filed today	MPR	0.20	\$750.00	\$150.00
Service	06/24/2024	1106 - Misc Motions & Court Hearings: Conduct legal research on WARN Act to address WL's assertion regarding same as basis for Motion to Compel (2.0); Draft memo for legal basis of Objection to Motion to Compel (1.0)	CML	3.00	\$175.00	\$525.00
Service	06/24/2024	1108 - Employment, Billing & Compensation: Prepare revisions to Application to Employ Sikich LLP as accountants for the Debtor.	EMR	0.80	\$450.00	\$360.00
Service	06/24/2024	1108 - Employment, Billing & Compensation: Phone conference with Jennifer Cordova regarding monthly fee to Fitzgerald Consultancy (.2); prepare revisions to Application to Employ Fitzgerald Consultancy (.3)	EMR	0.50	\$450.00	\$225.00
Service	06/24/2024	1110 - Claim Management Issues: Conduct analysis of payments due to injured employees to determine nature of same and authorization of payment of same.	EMR	0.50	\$450.00	\$225.00
Service	06/24/2024	1109 - Asset Analysis & Recovery: Prep of email to debtor/Eisner team re doc prodn and interrogatories (.2);	MPR	0.20	\$750.00	\$150.00
Service	06/24/2024	1113 - Executory Contracts: work on obj to WL motion to compel assumption/rejection of management agreement (2.0); mtgs w/ C. Lawson re research on motion to compel assumption/rejection of management agreement (.2)	MPR	2.20	\$750.00	\$1,650.00
Service	06/25/2024	1110 - Claim Management Issues: Proofs of claim analysis	KAH	4.20	\$275.00	\$1,155.00
Service	06/25/2024	1102 - Case Administration / US Trustee: Draft Declaration of Mark Flaherty in support of objection to WL's Motion to Compel (1.6); continue legal research on bases for objection to Motion to Compel (2.5); prepare further revisions to objection (1.7)	CML	5.80	\$175.00	\$1,015.00
Service	06/25/2024	1113 - Executory Contracts: Further work on obj to WL motion to compel assumption/rejection (1.1)work on Flaherty dec in support of obj to motion to compel (.5)	MPR	1.60	\$750.00	\$1,200.00

Service	06/25/2024	1109 - Asset Analysis & Recovery: Prep of email to Cordova, Pederson, Katz re appraisal discovery issues, and review related emails (.2); additional emails w/F. DiCatri, C. Brown, M. Flaherty re discovery and confidentiality issues (.3); emails w/client team and Eisner re appraisal issues (.2);	MPR	0.70	\$750.00	\$525.00
Service	06/25/2024	1110 - Claim Management Issues: Receive and review email string from William Pederson at EA Group regarding worker's compensation benefits paid to employees to continue analysis of same (.3); phone conference with William Pederson to obtain additional information on same (.3); conduct legal research on payment of same (1.2)	EMR	1.80	\$450.00	\$810.00
Service	06/25/2024	1110 - Claim Management Issues: Assist with analysis of proofs of claim filed in case.	EMR	0.50	\$450.00	\$225.00
Service	06/26/2024	1106 - Misc Motions & Court Hearings: Prepare documents for production pursuant to court order on Rule 2004 motion including financial statements and budget forecast	DTF	1.00	\$195.00	\$195.00
Service	06/26/2024	1106 - Misc Motions & Court Hearings: Prepare further revisions to objection to Motion to Compel	CML	0.80	\$175.00	\$140.00
Service	06/26/2024	1106 - Misc Motions & Court Hearings: Revise and finalize declaration of M. Flaherty in support of motion to compel assumption of administrative services agreement for executed signature	DTF	0.20	\$195.00	\$39.00
Service	06/26/2024	1110 - Claim Management Issues: Combine work on proof of claims summary to analyze claim	KAH	1.00	\$275.00	\$275.00
Service	06/26/2024	1106 - Misc Motions & Court Hearings: Prepare motion for Protective Order regarding disclosures to Computershare and WMH Funding to keep confidential from FirstPathway	JES	1.80	\$275.00	\$495.00
Service	06/26/2024	1112 - Debtor Meetings & Communications: Prep of agenda for team meeting (.1); team zoom status/strategy meeting (.9)	MPR	1.00	\$750.00	\$750.00
Service	06/26/2024	1109 - Asset Analysis & Recovery: t/conf w/F. DiCatri re rule 2004 discovery and confidentiality (.5); prep of email to F.	MPR	1.30	\$750.00	\$975.00

		DiCatri summarizing discovery agreement (.4); prep of email report to client team on discovery and confidentiality (.2); further emails w/F. DiCatri re discovery and confidentiality (.2)				
Service	06/26/2024	1113 - Executory Contracts: further work on obj to motion of WL to compel assumption/rejection and Flaherty Dec (1.0)	MPR	1.00	\$750.00	\$750.00
Service	06/26/2024	1108 - Employment, Billing & Compensation: Phone conference with Jennifer Cordova to obtain additional information for applications to employ accountants and lobbyist for the Debtor (.4); phone conference with Erin Horman at Sikich regarding preparation of tax returns (.2).	EMR	0.60	\$450.00	\$270.00
Service	06/27/2024	1110 - Claim Management Issues: Continue analyzing and summarizing proofs of claim filed in case	KAH	3.90	\$275.00	\$1,072.50
Service	06/27/2024	1106 - Misc Motions & Court Hearings: Prepare preliminary draft responses to document requests and interrogatories pursuant to Rule 2004 motion and court order	DTF	1.60	\$195.00	\$312.00
Service	06/27/2024	1106 - Misc Motions & Court Hearings: Update preparation of all documents responsive to discovery per Rule 2004 motion and order	DTF	0.90	\$195.00	\$175.50
Service	06/27/2024	1106 - Misc Motions & Court Hearings: Finalize declaration of M. Flaherty and Objection to White Lodging's Motion to Compel Debtor to Assume or Reject Administrative Services Agreement for filing with court	DTF	0.20	\$195.00	\$39.00
Service	06/27/2024	1113 - Executory Contracts: finalize obj to WL motion to compel	MPR	0.20	\$750.00	\$150.00
Service	06/27/2024	1109 - Asset Analysis & Recovery: T/conf w/F. DiCatri re adeq pro and discovery (.3); t/conf w/J. Cordova re financial info (.1); further correspondence w/F. DiCatri re financial info (.1); work on rule 2004 discovery responses (.5); prep of email to DiCatri with doc prodn and responses; related email report to clients (.2)	MPR	1.20	\$750.00	\$900.00
Service	06/27/2024	1104 - DIP Financing / Cash Collateral: Settlement t/conf w/F. DiCatri re adeq protection issues (.4); review emails from	MPR	0.90	\$750.00	\$675.00



DiCastri re interpretation of interim cash collateral order and prep of email to client team re same (.3); further call w/F. DiCastri re adequate protection (.2)						
Service	06/27/2024	1108 - Employment, Billing & Compensation: Work on Fitzgerald employment app and mtg w/E. Reyes re same	MPR	0.30	\$750.00	\$225.00
Service	06/27/2024	1108 - Employment, Billing & Compensation: Continue preparing revisions and additions to draft of Application to Employ Fitzgerald Consulting.	EMR	0.80	\$450.00	\$360.00
Service	06/27/2024	1110 - Claim Management Issues: Conduct email exchange with William Pederson at EA Group to obtain additional information on worker's compensation claims.	EMR	0.40	\$450.00	\$180.00
Service	06/28/2024	1113 - Executory Contracts: Research re: contract breach issues related to management agreement and Section 365	KAH	4.30	\$275.00	\$1,182.50
Service	06/28/2024	1106 - Misc Motions & Court Hearings: Review file and docket for details and status of all pending motions to determine timeline for objection deadlines and proposed orders	DTF	0.40	\$195.00	\$78.00
Service	06/28/2024	1110 - Claim Management Issues: Review late proof of claim filed to analyze allowability of same	KAH	0.60	\$275.00	\$165.00
Service	06/28/2024	1108 - Employment, Billing & Compensation: Research re: employment of lobbyist	KAH	0.80	\$275.00	\$220.00
Service	06/28/2024	1108 - Employment, Billing & Compensation: Prepare further revisions to Application to Employ Fitzgerald Consulting (.5); review case law on employment of lobbyists for chapter 11 debtors (1.3); prepare email to MPR forwarding latest drafts of applications (.2).	EMR	2.00	\$450.00	\$900.00
<b>Quantity Subtotal</b>						<b>160.7</b>
<b>Services Subtotal</b>						<b>\$62,610.00</b>

**Expenses**

Type	Date	Notes	Quantity	Rate	Total
Expense	05/09/2024	Copy Expense: Stretto Printing/Copying Expense:	1.00	\$9.00	\$9.00

## Order on Debtor's Motion with Respect to to Utility Service (Doc 105)

Expense	05/09/2024	Postage Expense: Stretto Postage Expense: Order on Debtor's Motion with Respect to to Utility Service (Doc 105)	1.00	\$8.59	\$8.59
Expense	05/15/2024	Copy Expense: Stretto Printing/Copying Expense: Order Setting Deadline to File Proofs of Claim or Interest and Approving Form of Notice (Doc 119)	1.00	\$55.80	\$55.80
Expense	05/15/2024	Postage Expense: Stretto Postage Expense: Order Setting Deadline to File Proofs of Claim or Interest and Approving Form of Notice (Doc 119)	1.00	\$61.34	\$61.34
Expense	05/15/2024	Copy Expense: Stretto Printing/Copying Expense: Chapter 11 Motion In Re- Motion for Order Establishing Procedures for Interim Compensation (Doc 120); Notice of Debtor's Motion for Order (Doc 121); and Proposed Order Establishing Procedures for Interim Compensation (Doc 122)	1.00	\$167.40	\$167.40
Expense	05/15/2024	Postage Expense: Stretto Postage Expense: Chapter 11 Motion In Re- Motion for Order Establishing Procedures for Interim Compensation (Doc 120); Notice of Debtor's Motion for Order (Doc 121); and Proposed Order Establishing Procedures for Interim Compensation (Doc 122)	1.00	\$85.68	\$85.68
Expense	05/15/2024	Copy Expense: Stretto Printing/Copying Expense: Debtor's Motion for Order Authorizing Payment of Prepetition Real Estate and Personal Property Taxes (Doc 112) and Notice of Debtor's Motion for Order Authorizing Payment of Prepetition Real Estate and Personal Property Taxes (Doc 123)	1.00	\$181.35	\$181.35
Expense	05/15/2024	Postage Expense: Stretto Postage Expense: Debtor's Motion for Order Authorizing Payment of Prepetition Real Estate and Personal Property Taxes (Doc 112) and Notice of Debtor's Motion for Order Authorizing Payment of Prepetition Real Estate and Personal Property Taxes (Doc 123)	1.00	\$85.68	\$85.68
Expense	06/13/2024	Mileage: Roundtrip mileage reimbursement for Attorney M. Richman to travel to Milwaukee Marriott Downtown	156.60	\$0.67	\$104.92
<b>Expenses Subtotal</b>				<b>\$759.76</b>	

Time Keeper	Position	Quantity	Rate	Total
Kayla Holmes	Associate	36.4	\$275.00	\$10,010.00
Eliza Reyes	Associate	25.0	\$450.00	\$11,250.00
Michael Richman	Partner	37.1	\$750.00	\$27,825.00

Michael Richman	Partner	2.5	\$375.00	\$937.50
James Soo	Associate	19.5	\$275.00	\$5,362.50
David Fowle	Paralegal	9.5	\$195.00	\$1,852.50
Christopher Lawson	Summer Associate	30.7	\$175.00	\$5,372.50
<b>Quantity Total</b>				<b>160.7</b>
<b>Subtotal</b>				<b>\$63,369.76</b>
<b>Total</b>				<b>\$63,369.76</b>